

1 Daniel P. Collins (No. 009055)
Jane M. Haggerty (No. 018794)
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3 40 North Central Avenue, Suite 2500
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4 (602) 254-5200

5 Attorneys for Liftpak Services, L.C.
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FILED
FROM OVERNIGHT BOX

AUG 09 1999

KEVIN E. O'BRIEN
CLERK U.S. BANKRUPTCY
COURT, DIST. OF AZ

7
8 **UNITED STATES BANKRUPTCY COURT**
9 **DISTRICT OF ARIZONA**

10 In re:) **Proceedings Under Chapter 11**
11)
BCE WEST, L.P., et al.,) **Case Nos. 98-12547 through**
12) **98-12570-PHX-CGC**
EID: 38-3196719)
13) **Contested Matter No. _____**
Debtors.)

14 **LIFTPAK SERVICES, L.C.,**
15)
Movant,)
16)

17 v.)

18 BCE WEST, L.P., et al., Debtors; BANK OF) **NOTICE OF FILING MOTION FOR**
AMERICA; G.E. CAPITAL; and CITIZENS) **RELIEF FROM AUTOMATIC STAY**
19 BANK OF RHODE ISLAND,) **AND NOTICE OF REQUIREMENT TO**
20 Respondents.) **FILE RESPONSE**
21)

22 NOTICE IS HEREBY GIVEN that LIFTPAK SERVICES, L.C. ("Movant"), has
23 filed a motion seeking relief from the automatic stay with respect to \$94,140 in proceeds from the
24 sale and insured theft of twelve (12) industrial trash compactors which BC Great Lakes, L.L.C.
25 (one of the entities comprising the Debtors), had leased from the Movant prepetition.

1 FURTHER NOTICE IS HEREBY GIVEN that pursuant to Local Bankruptcy
2 Rule 4001, if no objection is filed with the Court and a copy served upon Movant's attorney
3 whose address is:

4 Daniel P. Collins
5 LEONARD COLLINS & KELLY, P.C.
6 Two Renaissance Square
7 40 North Central Avenue, Suite 2500
8 Phoenix, Arizona 85004

9 WITHIN 15 DAYS of service of this notice, the motion for relief from the automatic stay may be
10 granted without further hearing.

11 Dated: August 9, 1999

LEONARD COLLINS & KELLY, P.C.

12 By Jane M. Haggerty for
13 Daniel P. Collins
14 Jane M. Haggerty
15 Attorneys for Movant

16
17 Copy of the foregoing
18 mailed this 9th day of
19 August, 1999, to:

20 United States Trustee
21 P.O. Box 36170
22 Phoenix, Arizona 85067-6170

23 Gary Hammond, Esq.
24 Groom, Hammond & Harris
25 100 North Broadway, Suite 1440
Oklahoma City, Oklahoma 73102
Co-Counsel for LIFTPAK Services, L.C.

...

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P.O. Box 36379
3 Phoenix, Arizona 85067-6379

4 Randolph J. Haincs, Esq.
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6 Phoenix, Arizona 85004-4429

7 Brad B. Erens, Esq.
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8 One First National Plaza
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10 Jean LeBlanc, Esq.
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12

Thomas J. Salerno, Esq.
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14 Phoenix, Arizona 85004-4440


15 John J. Fries, Esq.
Ryley Carlock & Applewhite, P.A.
16 101 North First Avenue, Suite 2700
Phoenix, Arizona 85003-1973
17

18 Copy of the foregoing
mailed along with the Motion
19 this 9th day of August, 1999, to:

20 Donald L. Gaffney, Esq.
Snell & Wilmer, L.L.P.
21 One Arizona Center
400 East Van Buren
22 Phoenix, Arizona 85004-0001
23 Attorneys for Ad Hoc Committee
of Unsecured Creditors and
24 Official Committee of Unsecured Creditors
25

1 Christopher H. Bayley, Esq.
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3 One Arizona Center
4 400 East Van Buren
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6 Attorneys for Official Committee of
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8 Richard F. Casher, Esq.
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10 One State Street
11 Hartford, Connecticut 06103-3178
12 Attorneys for Official Committee of
13 Unsecured Creditors

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